



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

David Plouffe, Treasurer  
Democratic Congressional Campaign  
Committee - Expenditures  
430 S Capitol Street, SE  
Washington, DC 20003

NOV 15 2000

Identification Number: C00000935

Reference: August Monthly Report (7/01/00-7/31/00)

Dear Mr. Plouffe:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): administrative services and political services. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule E discloses independent expenditures on behalf of federal candidates (pertinent portion(s) attached). Schedule B of a previous report disclosed in-kind contributions on behalf of some of these same candidates. Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

The coordination involved in making an in-kind contribution to a candidate may preclude your committee from making an independent expenditure in support of the same candidate. Under 11 CFR §109.1(c), any expenditure which does not qualify as an independent expenditure is considered an in-kind contribution. Please amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page), or provide additional clarifying information concerning the independent expenditures made in support of Michael Forbes.

If the reclassification of these expenditures as in-kind contributions results in excessive contributions, the Commission recommends that you notify the recipient(s) and request a refund of the amount in excess of \$5,000 per election. Please inform the Commission immediately in writing and provide a photocopy of your refund request(s) sent to the recipient(s). In addition, any refund should be disclosed on Schedule A supporting Line 16 of your next report.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Andrew J. Dodson  
Acting Assistant Branch Chief,  
Party/Non-Party Branch  
Reports Analysis Division

SCHEDULE E

## ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 1 Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)

DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE - EXPENDITURES

Ayd

Full Name, Mailing Address & ZIP Code  
of each PayeePurpose of  
ExpenditureDate (month,  
day, year)

Amount

Name of Federal Candidate  
supported or opposed by the  
expenditure (please specify)Bill Crouse Communications  
5149 Angeles Crest Highway  
La Canada, CA 91011Administrative  
Services

07/05/00 \$20,888.46

Michael Forbes  
NY/01☒ Support ☐ OpposeBill Crouse Communications  
5149 Angeles Crest Highway  
La Canada, CA 91011Communication  
Services

07/12/00 \$17,140.00

Michael Forbes  
NY/01☒ Support ☐ Oppose☐ Support ☐ Oppose☐ Support ☐ Oppose☐ Support ☐ Oppose☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures

\$ 38,028.46  
0.00

(b) SUBTOTAL of Unitemized Independent Expenditures

\$ 38,028.46

(c) TOTAL Independent Expenditures

Under penalty of perjury I certify that the independent expenditures reported herein have not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 16<sup>th</sup> day ofAugust 2000

My Commission expires

Oct. 31, 2002

NOTARY PUBLIC

Janica Kyriakopoulos  
Signature

8/16/00  
Date

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